

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WAYNE BALIGA, derivatively on behalf of  
LINK MOTION INC. (F/K/A NQ MOBILE INC.)

Plaintiff,

-against-

LINK MOTION INC. (F/K/A NQ MOBILE INC.),  
VINCENT WENYONG SHI,  
JIA LIAN,  
XIAO YU,

Defendants,

-and-

LINK MOTION INC. (F/K/A NQ MOBILE INC.),

Nominal Defendant.

Civil Action No.: 1:18-cv-11642

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the accompanying Declaration of Michael James Maloney, dated March 27, 2019, the exhibits annexed thereto, and upon the accompanying Memorandum of Law, and upon all prior proceedings, pleadings, and filings in this action, Defendant Vincent Wenyong Shi (“Shi”), by his undersigned counsel, will move this Court, located at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, before the Honorable Victor Marrero, United States District Judge, at a date and time to be determined by the Court, for an Order, pursuant to Rules 12(b)(2), (5) and (6) and Rule 60 of the Federal Rules of Civil Procedure, dismissing all claims as against Shi, dissolving the preliminary injunction entered on February 1, 2019, and discharging the receiver

appointed by the Court on February 1, 2019, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York  
March 27, 2019

CKR LAW, LLP

By: /s/ Michael James Maloney

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